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IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OKLAHOMA

FILED

JUN 2 0 2023

Mark C. McCartt, Clerk U.S. DISTRICT COURT

UNITED STATES OF AMERICA,

Plaintiff,

v.

JEREMIAH JACOB JAMES HARPER, a/k/a "Lil SBT," KENNETH LEE CAMP, a/k/a "Sitten Bear," BILLY GENE TALLEY,

Defendants.

Case No. 23 CR 21

FILED UNDER SEAL

INDICTMENT

[COUNT ONE: 21 U.S.C. §§ 846 and 841(b)(1)(A)(viii) – Drug

Conspiracy;

COUNT TWO: 21 U.S.C.

§§ 841(a)(1) and 841(b)(1)(B)(viii) – Distribution of Methamphetamine;

COUNT THREE: 21 U.S.C.

§§ 841(a)(1) and 841(b)(1)(A)(viii) -

Possession of Methamphetamine

with Intent to Distribute;

COUNT FOUR: 21 U.S.C.

§§ 856(a)(1) and 856(b) -

Maintaining a Drug-Involved

Premises;

COUNT FIVE: 18 U.S.C.

 $\S$  924(c)(1)(A)(i) – Possession of a

Firearm in Furtherance of a Drug

Trafficking Crime;

COUNT SIX: 18 U.S.C.

§§ 922(g)(1) and 924(a)(8) – Felon in

Possession of a Firearm and

Ammunition:

COUNTS SEVEN and EIGHT: 21

U.S.C. §§ 843(b) and 843(d)(1) -

Unlawful Use of a Communication

Facility;

Forfeiture Allegation: 18 U.S.C.

§ 924(d)(1), 21 U.S.C. § 853 and 28

U.S.C. § 2461(c)—Drug and

Firearms Forfeiture

THE GRAND JURY CHARGES:

COUNT ONE
[21 U.S.C. §§ 846 and 841(b)(1)(A)(viii)]

From in or about June 2022, to on or about August 25, 2022, in the Northern District of Oklahoma and elsewhere, the defendants, JEREMIAH JACOB JAMES HARPER, a/k/a "Lil SBT," KENNETH LEE CAMP, a/k/a "Sitten Bear," and BILLY GENE TALLEY, knowingly, intentionally, and willfully conspired, confederated, and agreed, together and with others known and unknown to the Grand Jury, to distribute and to possess with intent to distribute 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Sections 846 and 841(b)(1)(A)(viii).

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#### COUNT TWO [21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(viii)]

On or about August 24, 2022, in the Northern District of Oklahoma, the defendants, JEREMIAH JACOB JAMES HARPER, a/k/a "Lil SBT," and BILLY GENE TALLEY, knowingly and intentionally distributed 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(viii).

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## COUNT THREE [21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A)(viii)]

On or about August 25, 2022, in the Northern District of Oklahoma, the defendant, **KENNETH LEE CAMP**, a/k/a "Sitten Bear," knowingly and intentionally possessed with the intent to distribute 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(viii).

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# <u>COUNT FOUR</u> [21 U.S.C. §§ 856(a)(1) and 856(b)]

On or about August 25, 2022, in the Northern District of Oklahoma, the defendant, KENNETH LEE CAMP, a/k/a "Sitten Bear," unlawfully and knowingly used and maintained a place located at 12337 East 39th Street, Tulsa, Oklahoma, for the purpose of distributing methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 856(a)(1) and 856(b).

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#### <u>COUNT FIVE</u> [18 U.S.C. § 924(c)(1)(A)(i)]

On or about August 25, 2022, in the Northern District of Oklahoma, the defendant, KENNETH LEE CAMP, a/k/a "Sitten Bear," knowingly possessed a firearm in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, Possession of Methamphetamine with Intent to Distribute, as set forth more fully in Count Three of this Indictment.

All in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

### <u>COUNT SIX</u> [18 U.S.C. §§ 922(g)(1) and 924(a)(8)]

On or about August 25, 2022, in the Northern District of Oklahoma, the defendant, **KENNETH LEE CAMP**, a/k/a "Sitten Bear," knowing he had previously been convicted of at least one of the following crimes punishable by imprisonment for terms exceeding one year:

- 1. Felon in Possession of a Firearm, Case No. CF-2014-308, in the District Court of Okmulgee County, State of Oklahoma, on October 8, 2014; and
- 2. Bringing Contraband into a Place where Prisoners are kept, Case No. CF-2014-481, in the District Court of Okmulgee County, State of Oklahoma, on May 4, 2015,

knowingly possessed in and affecting interstate commerce the following firearms:

- 1. A Dickinson LLC, Model Ermox XXPA, 12-gauge caliber shotgun, serial number 204219262;
- 2. A Zastava-Kragujevac, Model M70AB2, 7.62 x 39mm caliber rifle, serial number M70AB08307;
- 3. A TaurusArmas, Model PT1140, .40 S&W caliber pistol, serial number SMU15280; and
- 4. A Fratelli Tanfoglio of Brescia, Model Pepperbox, 4-shot derringer caliber pistol, serial number A02480.

All in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

#### COUNTS SEVEN and EIGHT [21 U.S.C. §§ 843(b) and 843(d)(1)]

On or about the dates listed below, in the Northern District of Oklahoma, the defendants, JEREMIAH JACOB JAMES HARPER, a/k/a "Lil SBT" and KENNETH LEE CAMP, a/k/a "Sitten Bear," knowingly and intentionally used a communication facility, that is, a telephone (cellular or otherwise), in committing, causing, and facilitating the commission of acts constituting felonies under Title 21, United States Code, Sections 841 and 846, in that the defendants used the telephones to discuss various matters concerning the conspiracy to possess with intent to distribute and to distribute methamphetamine, a Schedule II controlled substance, as set forth in the chart below:

COUNT	DATE	DEFENDANTS	DESCRIPTION
7	8/25/22	JEREMIAH JACOB JAMES HARPER, a/k/a "Lil SBT" and KENNETH LEE CAMP, a/k/a "Sitten Bear"	Coordination of the sale of 220 grams of methamphetamine
8	8/25/22	JEREMIAH JACOB JAMES HARPER, a/k/a "Lil SBT" and KENNETH LEE CAMP, a/k/a "Sitten Bear"	Discussing drug proceed amounts

All in violation of Title 21, United States Code, Sections 843(b) and 843(d)(1).

# <u>FORFEITURE ALLEGATION</u> [18 U.S.C. § 924(d)(1), 21 U.S.C. § 853, and 28 U.S.C. § 2461(c)]

The allegations contained in this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 924(d)(1), Title 21, United States Code, Section 853, and Title 28, United States Code, Section 2461(c).

Upon conviction of the offenses alleged in this Indictment, as a part of their sentences, the defendants, JEREMIAH JACOB JAMES HARPER, a/k/a "Lil SBT," KENNETH LEE CAMP, a/k/a "Sitten Bear," and BILLY GENE TALLEY shall forfeit to the United States any property constituting, or derived from, or traceable to, the proceeds obtained, directly or indirectly, as a result of such violations, any firearm and ammunition involved in or used in the knowing commission of such offenses, and any property, real or personal, that was used or intended to be used to commit or to facilitate the violation of federal law. The property to be forfeited includes, but is not limited to:

#### FIREARMS AND AMMUNITION

- 1. A Dickinson LLC, Model Ermox XXPA, 12-gauge caliber shotgun, serial number 204219262;
- 2. A Zastava-Kragujevac, Model M70AB2, 7.62 x 39mm caliber rifle, serial number M70AB08307;
- 3. A TaurusArmas, Model PT1140, .40 S&W caliber pistol, serial number SMU15280;
- 4. A Fratelli Tanfoglio of Brescia, Model Pepperbox, 4-shot derringer caliber pistol, serial number A02480;

5. Any and all ammunition and magazines not specified; and

#### **CURRENCY**

6. Approximately \$2,800 in United States currency.

All pursuant to Title 18, United States Code, Section 924(d)(1), Title 21, United States Code, Section 853, and Title 28, United States Code, Section 2461(c).

CLINTON J. JOHNSON United States Attorney

A TRUE BILL

SPENCER WHALSON

Assistant United States Attorney

/s/ Grand Jury Foreperson
Grand Jury Foreperson

AO 442 (Rev. 10/13) Arrest Warrant	SEAL	ED	Fived U.S. Marshala Service			
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for the 2023 30 N 21 PM 1; 17						
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United States o	f America		M-25-220-ST			
KENNETH LE a/k/a "Sitten Defenda	Bear"	Case No.	23 CR 21 3 GKF			
ARREST WARRANT						
To: Any authorized law enf	orcement officer					
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(name of person to be arrested) KEN who is accused of an offense or v	NETH LEE CAMP, a/k/a "Sitte	en Bear."	h the court:			
	is follows:  A)(viii) – Drug Conspiracy (A)(Viii) – Possession of Met (A) – Maintaining a Drug-Involved (B) – Maintaining a Drug-Involved (B) – Felon in Possession of a Fi (B) – Unlawful Use of a Communic (B) – William (B) – W	hamphetamine wi Premises ace of a Drug Traffirearm and Ammu cation Facility Drug and Firearm	ficking Crime nition			
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